

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

In Re:	*	Case No.1:18-bk-14408
	*	Judge Jeffrey P. Hopkins
Flipdaddy's, LLC	*	Chapter 11 Proceeding
	*	
	*	
Debtor	*	

**STIPULATION AND AGREEMENT OF THE DEBTOR AND
PARK NATIONAL BANK TO MODIFY THE PROPOSED PLAN
TREATMENT OF PARK NATIONAL BANK (CLASS 1)**

Now comes, Flipdaddy's, LLC, (the "Debtor") by and through undersigned counsel and Park National Bank ("Park National") by and through the undersigned counsel and stipulate and agree that the Debtor and Park National ("the Parties") have reached an agreement with respect to a modification of the Plan (Doc. No. 110) as to the treatment of Park National Bank under Class 1 of the Plan.

1. The Parties would stipulate and agree that the Plan treatment under *Class 1(b)(ii) Treatment*, provides the following:

This claim shall be reduced to \$200,000 by a payment of \$50,000.00 from the Debtor or FDXII under the Backstop Commitment Agreement and upon such payment the balance of \$200,000 shall be re-amortized over 8 years and accrue interest at the rate of 6% per annum.

2. The Parties agree that the Plan treatment should be modified to reflect the following:

This claim shall be reduced to \$200,000 by a payment of \$50,000.00 from the Debtor or FDXII under the Backstop Commitment

Agreement and upon such payment the balance of \$200,000 shall be re-amortized over **7 years, maturing on 4/27/2026** and accrue interest at the rate of 6% per annum.

3. The proposed modification is reflected by the change from 8 years to 7 years and also includes the maturity date as set forth in ***bold and italicized***.

4. Based on this modification and change in the treatment of Park National Bank being accepted by the Court and approved as part of the order on Confirmation, Park National Bank intends to submit a ballot approving the Plan. In the event this modification and or change is not accepted by the Court, then nothing in this Stipulation shall affect or prejudice, or shall be deemed to affect or prejudice the rights of Park National to withdraw such ballot, present a ballot objecting to the Plan and to assert objections to the confirmation of the Plan, all of which are hereby reserved and preserved in all respects.

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